



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

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December 4, 2019

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With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: in a discussion with Detective Robert White during trial preparation, the officer indicated that during the time he has been employed by the New York City Police Department, he believed that he was named as a defendant in a civil lawsuit.

As a result of the conversation with Det. White, the People performed a simple name search of the Public Access to Court Electronic Records ["PACER"] website, and found the following cases which list "Robert White" and "City of New York" as civil defendants in the Eastern and Southern Districts of New York and found no cases.

Additionally, Det. White indicated that following an Internal Affairs investigation about eight years ago, he received a command discipline for failing to notify a supervisor regarding missing prisoner property. As a result of the finding, Det. White lost two vacation days.

The People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.